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12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 JOHN ENOS, an individual,

15 Plaintiff,

16 vs.

17 DOUGLAS COUNTY, a political subdivision  
of the State of Nevada; SCOTT SHICK, Chief  
18 Juvenile Probation Officer of the Juvenile  
Probation Department; *et al.*

19 Defendants.  
20

CASE NO: 3:17-cv-00095-MMD-CLB

21 **STIPULATION AND [PROPOSED]  
ORDER TO ENLARGE TIME TO FILE  
PROPOSED JOINT PRETRIAL ORDER**

(First Request)

22 COMES NOW Plaintiff JOHN ENOS and Defendants DOUGLAS COUNTY, SCOTT SHICK,  
23 and VICTORIA SAUER-LAMB, by and through their undersigned attorneys of record, and hereby  
24 request a 30-day enlargement of time for the parties to file their proposed Joint Pretrial Order (JPTO).  
25 The proposed JPTO is currently due on Monday, April 20, 2020. At this time, the parties believe that  
26 additional time, between 30-60 days, is necessary to submit the proposed JPTO; however, the parties'  
27 first request is limited to requesting 30 additional days **through and including Wednesday, May 20,**  
28 **2020** to file the proposed JPTO. The Coronavirus Disease (COVID-19) pandemic has impaired

1 counsel's ability to prepare the JPTO. For example, one attorney for Plaintiff is located in Las Vegas,  
2 where COVID-19 case are much higher and would require out-of-town counsel to travel to Washoe  
3 County. As well, due to Governor Sisolak's social distancing guidelines and directives, other counsel  
4 have been subject to office closures and staff reductions, hindering counsel's ability to do work  
5 necessary to prepare the JPTO. Due to the same social distancing guidelines, there is also great  
6 uncertainty as to the availability of the parties, counsel, witnesses and potential jurors to interact at a  
7 trial. What's more, it is not known when normal Court operations will resume in light of the exigent  
8 circumstances and temporary restrictions regarding court operations imposed by Temporary General  
9 Order 2020-04. At the time of the issuance of Temporary General Order 2020-04 the Court noted there  
10 were 26 reported cases of COVID-19. *See generally*, Temporary General Order 2020-04, fn. 1. As of  
11 the present date of filing the instant Stipulation, the number of reported cases in Washoe County is 309,  
12 which continues to increase daily.<sup>1</sup> Since the issuance of Temporary General Order 2020-04,  
13 Governor Sisolak recently extended the closure of businesses and schools from April 16, 2020 until at  
14 least April 30, 2020. While nationwide it has been reported that COVID-19 cases are expected to peak  
15 within the next week to ten days, recent reports concerning Washoe County have modelled the peak of  
16 COVID-19 cases in Washoe County as possibly coming near the end of May.<sup>2</sup> Consequently, it is  
17 unknown at this time when the Court will resume normal operations, including setting trials, which  
18 further frustrates the parties' attempts to arrive at good-faith representations of availability of trial  
19 counsel, the parties and witnesses for trial.

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27 <sup>1</sup> *See* [https://www.rgj.com/story/news/2020/04/07/washoe-county-coronavirus-update-reno-](https://www.rgj.com/story/news/2020/04/07/washoe-county-coronavirus-update-reno-las-vegas-nevada/2959245001/)  
28 [las-vegas-nevada/2959245001/](https://www.rgj.com/story/news/2020/04/07/washoe-county-coronavirus-update-reno-las-vegas-nevada/2959245001/) (last accessed April 7, 2020).

<sup>2</sup> *See* fn. 1.

1 This is the parties' first request to extend this deadline, and the parties submit that this request is not for  
2 the purpose of undue delay.

3 Dated this 7<sup>th</sup> day of April 2019.

4 THE GEDDES LAW FIRM, P.C.

5 By: 

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11 *Attorneys for Plaintiff John Enos*

12 Dated this 7<sup>th</sup> day of April 2020.

13 THORNDAL ARMSTRONG DELK  
14 BALENBUSH & EISINGER

15 *Electronic Signature Authorized*

16 /s/

17 By: \_\_\_\_\_

18 Katherine F. Parks, Esq.  
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21 Phone: (775) 786—2882  
22 *Attorneys for Defendants*

23 **II.**

24 **ORDER**

25 IT IS SO ORDERED.

26 Dated: April 8, 2020

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28 UNITED STATES DISTRICT JUDGE